US MAGISTRATE COURT JSH-SDTX

FILED

CLR

United States District Court

APR -3 2015

SOUTHERN DI	STRICTOR	TEXAS	David J. Bradley, Clerk
	I A PATE		Laredo Division
UNITED STATES OF AMERICA) out ple i	CRIMINAL COMPI	LAINT
V. Isidro Lopez-Cordova San Luis Potosi, Mexico	S Var	Case Number: 5:15 n	nj 398-1
(Name and Address of Defendant)			
I, the undersigned complainant state that the following is true and correct to the best of my			
knowledge and belief. On or about April 2, 20	(Date)	in Hebbronville, Texas Jin	n Hogg County, in
the Southern District of Te	exas,	Isidro Lopez-Cordova	_defendant(s),
a Mexican citizen, did unlawfully guide Honduran national Victor Manuel Lopez-Gutierrez and El Salvador national Santos Oscar Gonzalez-Dominguez and five other undocumented aliens in an attempt to circumvent an immigration checkpoint within the Southern District of Texas knowing or in reckless disregard of the fact that said aliens had come to, entered, or remained in the United States in violation of law, and guided or moved said aliens within the United States in furtherance of such violation of law.			
in violation of Title 8 United States	Code, Section(s	s) 1324 (a) (1) (A	
Special Agent,			
I further state that I am a(n) Homeland Security Investigations and that this complaint is based on the Official Title			
following facts: based on statements of the accused and records of the Immigration & Naturalization Service.			
See Attachment "A"			
Continued on the attached sheet and made a part of this complaint: XYes No			
Lou L. Robinsa Signature of Complainant			
		Lori Robinson	
		Printed Name of Complainant	
Sworn to before me and signed in my presence,			
April 3, 2015	at	Laredo, Texas	
Date		City and State	
J. Scott Hacker			
U.S. Magistrate Judge		1/01	
Name and Title of Judicial Officer		Signature of Judicial Officer	

United States of America

Page 2

VS

Isidro Lopez-Cordova

[CONT OF BASIS OF COMPLAINT]

On April 2, 2015, Homeland Security Investigations (HSI) Laredo Special Agents (SAs) and Task Force Agents (TFAs) responded to a request for investigative assistance from the U.S. Border Patrol Hebbronville station. Hebbronville Border Patrol Agents stated they had apprehended a group of eight undocumented immigrants after following foot tracks. Border Patrol Agents stated they arrested the group and determined all 8 subjects were illegally present in the country and transported them back to their processing center for further processing.

On April 2, 2015, HSI agents read Isidro LOPEZ-Cordova his constitutional rights in the Spanish language. LOPEZ stated he understood his rights, but refused to speak to HSI agents. LOPEZ freely stated he was not the smuggler of the group and that he was just another undocumented immigrant trying to go to the interior of the United States.

Santos Oscar Gonzalez-Dominguez, an El Salvador national, stated he had illegally crossed into the United States by wading across the Rio Grande River near Roma, Texas. Gonzalez-Dominguez stated that he was held in Miguel Aleman, Mexico, at a warehouse, for a few days prior to making the illegal entry into the United States. Gonzalez-Dominguez identified LOPEZ as the individual that helped him cross the river and guided him through the brush once in the United States.

Victor Manuel Lopez-Gutierrez, a Honduras national, stated he had illegally crossed into the United States by wading across the Rio Grande River near Roma, Texas. Lopez-Gutierrez stated he was held in Miguel Aleman, Mexico, at a warehouse, for a few days prior to making the illegal entry into the United States. Lopez-Gutierrez identified LOPEZ as the individual that helped him cross the river and guided him through the brush once in the United States.